

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

DISABILITY RIGHTS NEW MEXICO, INC.,

Plaintiff,

v.

Case No. 1:22-CV-00954 WJ/JFR

TAFOYA LUCERO, et al.,

Defendants.

JOINT MOTION TO STAY PROCEEDINGS UNTIL SEPTEMBER 1, 2023

THE PARTIES, through their undersigned counsel, respectfully request this Court stay all proceedings in this case until September 1, 2023 so the Parties can conduct negotiations in this matter. The grounds for this motion are:

1. The Parties agree to an additional stay of proceedings;
2. The previous stay expired on July 3, 2023;
3. The Parties agree to a stay of an additional sixty days from July 3, 2023 until September 1, 2023;
4. The Parties will continue to meet to conduct negotiations in this matter;
5. The Parties agree that once the stay expires or is lifted, Plaintiff may file an Unopposed Motion to Surreply to Defendants' Motion to Dismiss; and
6. The Parties seek this stay in the interest of conserving judicial resources and the resources of the parties while they conduct negotiations.

For the above-stated reasons, the parties respectfully request that the Court enter an order staying all proceedings in this case until September 1, 2023.

Respectfully submitted,

**AMERICAN CIVIL LIBERTIES
UNION OF NEW MEXICO**

/s/ Maria Martinez Sanchez

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon all counsel of record via the CM/ECF system on this 5th day of July 2023.

/s/ *Maria Martinez Sanchez*
Maria Martinez Sanchez